

**BEFORE THE
NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Petition of the Nebraska)	
Telecommunications Association for)	
Investigation and Review of Processes and)	Application No. NUSF-77
Procedures Regarding the NUSF.)	

**RURAL INDEPENDENT COMPANIES' PROPOSED ISSUES LIST
AND COMMENTS**

The Rural Independent Companies¹ commend the Commission for establishing the NUSF, and particularly the High Cost Fund, which has been and continues to be critical to the preservation and advancement of universal service in Nebraska for the benefit of all Nebraska telecommunications consumers, and which continues to create access to advanced telecommunications and information services for all regions of the State. The Rural Independent Companies further commend the Commission for opening this docket at the request of the Nebraska Telecommunications Association ("NTA").

On January 14, 2010, a Petition was filed by the NTA requesting commencement of an investigation and review of the processes and procedures regarding the Nebraska Universal Service Fund ("NUSF"). On March 8, 2010, the Commission held a planning conference to discuss a timeline for the development of issues to be included in its investigation and review of the processes and procedures regarding the NUSF. The Commission concluded that interested parties should file a list of issues and/or comments to be discussed during a workshop to be held on June 24, 2010.

¹ Arlington Telephone Company, Blair Telephone Company, Cambridge Telephone Co., Clarks Telecommunications Co., Consolidated Telephone Company, Consolidated Telco, Inc., Consolidated Telecom, Inc., The Curtis Telephone Company, Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hamilton Telephone Company, Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Company, Inc., K & M Telephone Company, Inc., The Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Rock County Telephone Company, Stanton Telephone Co., Inc., and Three River Telco are identified as the "Rural Independent Companies".

The Rural Independent Companies identified below appreciate the opportunity to provide these brief comments and the Proposed Issues List in response to the Commission's Order Setting Procedural Schedule, entered March 10, 2010.

Proposed Issues List

Issue No. 1: Should the Commission establish a new NUSF Broadband Deployment Fund ("BDF"), separate and apart from existing NUSF programs, for the purpose of expanding the availability of broadband in this State?

If the response to Issue No. 1 is in the affirmative, the following sub-issues should be considered:

Sub-Issue A: What definition of "broadband", including minimum actual download and upload speeds, should be utilized by the Commission with regard to the BDF?

Sub-Issue B: What are the policy goals of the BDF?

Sub-Issue C: What is the funding source for the BDF?

Sub-Issue D: What should be the size of the BDF?

Sub-Issue E: Who is eligible to apply and to receive grants from the BDF?

Sub-Issue F: How can the results of the current broadband mapping project be best utilized to target BDF grants?

Sub-Issue G: What will be the terms and procedures of the application and grant process, including application requirements, project evaluation criteria, award process, project completion reporting and verification?

Issue No. 2: How can the NUSF, and in particular the BDF, be most effectively integrated with the FCC's development and implementation of the National Broadband Plan ("NBP"), and specifically Chapter 8 thereof?

Sub-Issue A: Should this docket be held in abeyance until the FCC completes the significant changes described in "Stage One" of the "Roadmap for USF/ICF Reform" (NBP, p. 144)?

Sub-Issue B: How can the Commission best coordinate its NUSF policies with federal actions to promote broadband availability in Nebraska?

Sub-Issue C: Should the Commission and Nebraska ETCs support the FCC's "Recommendations" regarding federal USF reform and intercarrier compensation reform set forth in Chapter 8 of the NBP? If not, in what respects should such Recommendations be modified?

Issue No. 3: Will current NUSF surcharge receipts be sufficient to maintain universal service in Nebraska if the changes to the federal USF described in the NBP are adopted by the FCC? If not, what actions can be taken by the Commission to maintain universal service in this State?

The Rural Independent Companies look forward to receiving suggested issues that may be identified by other parties to this proceeding, and will provide comments thereon in the Rural Independent Companies' Reply Comments. The Rural Independent Companies also intend to participate in the Commission Workshop scheduled in this proceeding for June 24, 2010.

Dated: April 19, 2010.

Arlington Telephone Company, Blair Telephone Company, Cambridge Telephone Co., Clarks Telecommunications Co., Consolidated Telephone Company, Consolidated Telco, Inc., Consolidated Telecom, Inc., The Curtis Telephone Company, Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hamilton Telephone Company, Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Company, Inc., K & M Telephone Company, Inc., The Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Rock County Telephone Company, Stanton Telephone Co., Inc., and Three River Telco (the "Rural Independent Companies")

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CERTIFICATE OF SERVICE

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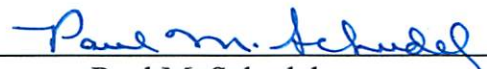
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A handwritten signature in blue ink that reads "Paul M. Schudel". The signature is written in a cursive style and is positioned above a horizontal line.

Paul M. Schudel